

#### REMARKS

Applicants' attorney is appreciative of the telephone discussions held with Examiner Beach on January 25, and February 22, 2010, regarding proposed amendments to the claims for the purpose of placing the claims in condition for allowance. Claims 14 and 22 have now been amended as discussed to more clearly recite the structure of the second unit and the relationship between the first and second units.

Claims 14-17 and 19-20 have been rejected under 35 USC 103(a) over Jacobsen et al in view of Flesen, while Claims 18 and 22-23 have been rejected under 35 USC 103 over Jacobsen et al in view of Flesen in view of Edvardsen.

In claims 14 and 22 as amended, the second unit is defined as being movable with respect to the ROV, as is evident from the drawings showing some degree of flexibility in the connection between the ROV and the second unit. Further, the second unit is recited as comprising the ejector having a suction portion attached to a suction hose, a discharge portion and a nozzle having an outlet disposed between the suction portion and the discharge portion, and an inlet connected to a conduit having at an end opposite to the nozzle an inlet provided with a second coupling part. The first unit is recited as comprising an ROV linkage connectable to the locking member, and constructed and arranged for operating the locking member to enable rapid coupling of the ejector to the connecting hose and rapid uncoupling of the ejector from the connecting hose.

The Jacobsen et al patent shows an ROV having an ejector pump connected to a nozzle disposed in a suction hose, one end of the suction hose being connected to a linkage of the ROV. However, there is no rapid coupling and uncoupling means operable by the ROV linkage to enable removal of a second unit from a first unit. To the extent the apparatus of Jacobsen et

al includes elements of a second unit as defined according to the claimed invention, they are not movable with respect to the ROV.

Flesen similarly shows a dredging apparatus including a nozzle, a suction hose and an ejector pump. Various couplings are shown, but there is no disclosure or suggestion that any of these couplings should be rapid couplings operable by an ROV linkage to enable rapid coupling and uncoupling of a second unit and a first unit. Moreover, all elements are connected rigidly together and the second unit, to the extent elements of a second unit are shown, is not movable with respect to the ROV.

The Edvardsen patent has been cited to show a discharge hose connected to the outlet side of an ejector so that sediment can be transported away from a borehole. Edvardsen also does not disclose or suggest a second unit movable with respect to a first unit, or a rapid coupling device operable by a linkage connected to an ROV.

Withdrawal of these rejections is accordingly requested.

In view of the foregoing amendments and remarks, Applicants submit that the present application is now in condition for allowance. An early allowance of the application is earnestly solicited.

Respectfully submitted,



Ira J. Schultz  
Registration No. 28666  
Attorney for Applicants  
(703)837-9600, ext. 23

Dennison, Schultz & MacDonald  
1727 King Street, Suite 105  
Alexandria, VA 22314